

No. 21-1394

IN THE
Supreme Court of the United States

JOHN FITISEMANU, *et al.*,
Petitioners,
v.

UNITED STATES OF AMERICA, *et al.*,
Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Mark C. Fleming, a member of the bar of this Court, certify that the accompanying Brief for Scholars of Constitutional Law and Legal History as Amici Curiae in Support of Petitioners contains 5,966 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on May 26, 2022.

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